

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2011-299-C**

In the Matter of the Application of )  
 )  
COMMUNICATION TELEFONICAS )  
LATINAS CORP )  
 )  
 )  
For a Certificate of Public Convenience and )  
Necessity to Provide Resold )  
Interexchange Telecommunications )  
Services in the State of South Carolina )

**DIRECT TESTIMONY OF  
RODNEY A. HARRISON**

1 **Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.**

2 A. My name is Rodney A. Harrison. I am the President of Communication Telefonicas  
3 Latinas Corp. (CTLC).

4 **Q. PLEASE BRIEFLY DESCRIBE YOUR BACKGROUND, INCLUDING**  
5 **EDUCATIONAL AND BUSINESS EXPERIENCE.**

6 A. As a consultant to small telecommunication service providers, I have been exposed to a  
7 variety of aspects of the telecommunications industry. My business experience includes  
8 management positions with supervisory authority in internal account management,  
9 customer billing and customer service, staff supervisions and scheduling, bookkeeping  
10 and regulatory liaison with state utility commissions and the Federal Communications  
11 Commission (FCC). Prior to my investment interests in telecommunications through  
12 CTLC, I worked as a consultant to Communications Enterprises. In this role, I crafted

1 solutions to help telecommunications companies fulfill their regulatory, corporate, tax  
2 and administrative needs and comply with the Federal and State requirements applicable  
3 to their businesses.

4 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

5 A. No, I have not.

6 **Q. ARE YOU FAMILIAR WITH THE APPLICATION FILED BY CTLC?**

7 A. Yes. I assisted in the preparation of the Application.

8 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

9 A. The purpose of my testimony is to describe the technical, managerial and financial fitness  
10 of CTLC to provide resold interexchange telecommunications services within the State of  
11 South Carolina. This testimony will also describe the services to be provided by CLTC.  
12 Finally, my testimony will show that the public interest will be served by the approval of  
13 CTLC's Application.

14 **Q. ARE ALL OF THE STATEMENTS IN CTLC'S APPLICATION CORRECT AND**  
15 **TRUE TO THE BEST OF YOUR KNOWLEDGE, INFORMATION AND**  
16 **BELIEF?**

17 A. Yes

18 **Q. DO YOU WISH TO INCORPORATE BY REFERENCE ANY DOCUMENTS**  
19 **INTO THIS TESTIMONY?**

20 A. Yes. I wish to incorporate, by reference, CLTC's underlying Application filed in this  
21 proceeding and its associated exhibits.

1 **Q. DO YOU RATIFY AND CONFIRM THE STATEMENTS AND**  
2 **REPRESENTATIONS MADE IN THAT APPLICATION AND ALL EXHIBITS**  
3 **THERE TO?**

4 A. Yes.

5 **Q. HAS APPLICANT REGISTERED TO DO BUSINESS IN SOUTH CAROLINA?**

6 A. Yes. CTLC received foreign corporation authority in South Carolina on June 20, 2011.

7 A copy was attached as **Exhibit A** to the Application.

8 **Q. HAS ANYTHING OCCURRED SINCE CTLC FILED ITS APPLICATION THAT**  
9 **MATERIALLY CHANGES THE REPRESENTATIONS THEREIN?**

10 A. No. The representations made in the Application remain materially the same.

11 **Q. DESCRIBE THE AUTHORITY THAT CTLC SEEKS BY ITS APPLICATION.**

12 A. CTLC seeks authority to provide all forms of long distance telecommunications services  
13 to the public on a resale basis via the facilities of its underlying carriers.

14 **Q. DOES CTLC PROPOSE TO OFFER TELECOMMUNICATIONS SERVICES TO**  
15 **BOTH RESIDENTIAL AND BUSINESS/COMMERCIAL CUSTOMERS?**

16 A. CTLC will serve residential and business customers.

17 **Q. DO THE PRINCIPALS AND EMPLOYEES OF CTLC HAVE PREVIOUS**  
18 **TELECOMMUNICATIONS EXPERIENCE?**

19 A. Yes. As described in **Exhibit D** of the Application, the officers and senior management  
20 of CTLC have considerable previous telecommunications experience.

21 **Q. PLEASE DESCRIBE CTLC'S FINANCIAL QUALIFICATIONS TO PROVIDE**  
22 **TELECOMMUNICATIONS SERVICES IN SOUTH CAROLINA.**

1 A. As set forth in the financial statements found at **Exhibit C** to the Application and filed  
2 under seal, CTLC has access to sufficient capital to provide telecommunications services  
3 in South Carolina. This capital, along with future capital financed by expected revenues  
4 of CTLC, will be available to meet future capital needs of CTLC's South Carolina  
5 operations.

6 **Q. DOES CTLC INTEND TO OFFER PREPAID DEBIT CARD SERVICES IN**  
7 **SOUTH CAROLINA?**

8 A. Not at this time. CTLC is aware of the Commission's \$5,000 bond or certificate of  
9 deposit requirement associated with prepaid debit card services, and will file such an  
10 instrument with the Commission should CTLC decide to offer these services in the  
11 future.

12 **Q. HOW DOES APPLICANT BILL FOR ITS SERVICES?**

13 A. CTLC will use local exchange carrier (LEC) billing to bill its customers. LEC billing  
14 means that CTLC will use an intermediary billing agent that will in turn interface with  
15 the LECs serving the end user with local exchange telephone service.

16 **Q. HOW ARE TROUBLE REPORTS AND CUSTOMER COMPLAINTS**  
17 **HANDLED?**

18 A. Trouble reports and customer complaints are handled through CTLC's internal customer  
19 service department. CTLC will have Customer Care representatives available during  
20 normal business hours, as well as 24-hour automated customer assistance, which will  
21 allow customers to bring service, billing and repair questions or complaints to the  
22 Company's attention 24 hours a day, 7 days a week, facilitating the quick and efficient  
23 resolution of Customer concerns. Customers may access Customer Care through CTLC's

1 toll-free customer service number to initiate service complaints or to receive updates on  
2 reported problems or pending requests. Inquiries regarding service or billing may also be  
3 made in writing. Customers may thereafter utilize the Company's automated update  
4 system or transfer to a Company representative for additional information or assistance.

5 **Q. DOES CTLC HAVE OFFICES IN SOUTH CAROLINA?**

6 A. No, CTLC does not intend to have offices in South Carolina at this time. Accordingly,  
7 CTLC requests, pursuant to Commission Rule 103-610, that the Commission allow it to  
8 keep all applicable books and records at its offices in Georgia. In the event that the  
9 Commission or the South Carolina Office of Regulatory Staff (ORS) should desire to  
10 inspect such books and records, CTLC will provide access expeditiously at its own  
11 expense.

12 **Q. HOW WILL CTLC MARKET ITS SERVICES?**

13 A. CTLC will market its services through telemarketing activities.

14 **Q. HAS CTLC OBTAINED AUTHORITY TO PROVIDE ITS SERVICES IN ANY**  
15 **OTHER STATES?**

16 A. Yes. CTLC is presently authorized to provide interexchange long distance  
17 telecommunications services in the States of California, Florida, Georgia, Illinois,  
18 Nevada, North Carolina, Texas and Washington. CTLC currently has an application to  
19 provide interexchange long distance telecommunications services pending in the State of  
20 Alabama.

21 **Q. PLEASE DESCRIBE THE PROPOSED TARIFF FILED BY CTLC.**

22 A. CTLC filed as **Exhibit E** to the Application its proposed long distance  
23 telecommunications service tariff. That tariff contains the applicable rules and

1 regulations for the provision of such services. I believe that CTLC's tariff will comport  
2 with all applicable Commission Rules and Orders, and CTLC agrees to make all changes  
3 suggested by the ORS that may be necessary to comply with applicable authority.

4 **Q. WILL GRANTING CTLC A CERTIFICATE SERVE THE PUBLIC INTEREST**  
5 **OF SOUTH CAROLINA CONSUMERS?**

6 A. Yes. A decision by the Commission to grant CTLC authority to provide interexchange  
7 telecommunications service is in the best interest. The public interest will be served by  
8 expanding the availability of competitive telecommunications services and enhanced  
9 telecommunications infrastructure in the State of South Carolina, thereby facilitating  
10 economic development. Authorizing CTLC to enter the telecommunications services  
11 market will increase the competitive choices available, and in turn create incentives for  
12 all carriers to lower prices, provide new and better quality services, and be more  
13 responsive to customer issues and demands.

14 **Q. WHO IS KNOWLEDGEABLE ABOUT CTLC'S OPERATIONS AND WILL**  
15 **SERVE AS THE COMMISSION'S/ORS'S REGULATORY AND CUSTOMER**  
16 **SERVICE CONTACT?**

17 A. All ongoing compliance matters should be directed to my attention.

18 **Q. WILL CTLC COMPLY WITH ALL OF THE APPLICABLE RULES,**  
19 **REGULATIONS AND ORDERS OF THE COMMISSION?**

20 A. Yes.

21 **Q. DOES THIS COMPLETE YOUR TESTIMONY?**

22 A. Yes.

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COMMUNCIATION TELEFONICAS	)	
LATINAS CORP	)	
	)	<b>CERTIFICATE OF SERVICE</b>
	)	
For a Certificate of Public Convenience and	)	
Necessity to Provide Resold	)	
Interexchange Telecommunications	)	
Services in the State of State Carolina	)	

This is to certify that I have caused to be served this day, one (1) copy of the **Prefiled Direct Testimony of Rodney Harrison** by placing a copy of same in the care and custody of the United States Postal Service (unless otherwise specified), with proper first-class postage affixed hereto and addressed as follows:

**VIA ELECTRONIC MAIL SERVICE**

C. Lessie Hammonds, Esquire  
Shealy Boland Reibold, Esquire  
Office of Regulatory Staff  
Legal Department  
PO Box 11263  
Columbia SC 29211

s/ Carol Roof \_\_\_\_\_  
Carol Roof  
Paralegal

August 16, 2011  
Columbia, South Carolina